

Objection deadline: October 25, 2019

Hearing date: To Be Determined

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

)
) Chapter 15
)

PERFORADORA ORO NEGRO, S. DE R.L. DE
C.V., *et al.*,

) Case No. 18-11094 (SCC)
)
)

Debtors.

)
)
) GONZALO GIL-WHITE, PERSONALLY AND
) IN HIS CAPACITY AS FOREIGN
) REPRESENTATIVE OF PERFORADORA ORO
) NEGRO, S. DE R.L. DE C.V. AND
) INTEGRADORA DE SERVICIOS
) PETROLEROS ORO NEGRO, S.A.P.I. DE C.V.,
)

) Adv. Pro. No. 19-01294 (SCC)
)
)

Plaintiff,

v.

ALP ERCIL, *et al.*,

Defendants.

NOTICE OF SINGAPORE DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Singapore Defendants' Motion to Dismiss, the declaration of the Singapore Rig Owners (as defined in the Motion to Dismiss), the declarations of Roger Hancock and Roger Bartlett, and the pleadings and papers filed in the Chapter 15 case and in this adversary proceeding, Defendants Oro Negro Primus, Oro Negro Laurus, Oro Negro Fortius, Oro Negro Decus, and Oro Negro Impetus, Roger Bartlett, Roger Hancock, and Hunter Cochrane, Jr. (together, the "**Singapore Defendants**"), by their undersigned counsel, will move (the "**Motion to Dismiss**"), before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the

United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(6), as incorporated by Rule 7012 of the Federal Rules of Bankruptcy Procedure, for an order, in the form annexed hereto, dismissing the Complaint in the above-captioned adversary proceeding in its entirety and with prejudice.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Motion to Dismiss must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, and (i) shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a CD or flash drive, preferably in Portable Document Format, *i.e.* PDF, WordPerfect, or any other Windows-based word processing format on or before October 25, 2019; and (ii) a hardcopy of such objection or response shall be served, upon (A) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004; (B) the undersigned counsel to the Singapore Defendants, Dechert LLP, 1095 Avenue of the Americas, New York, New York 10036, Attn: Allan S. Brilliant, Esq. and Shmuel Vasser, Esq., and (C) on all other counsel representing any other defendants, so as to be actually received on or before October 25, 2019.

PLEASE TAKE FURTHER NOTICE that, a hearing on the Motion to Dismiss will be held on a date and time to be scheduled by the Court, at the United States Courthouse, One Bowling Green, New York, New York.

Dated: August 26, 2019
New York, New York

Respectfully submitted,

By: /s/ Shmuel Vasser

Allan S. Brilliant
Shmuel Vasser
David A. Kotler
Catherine Wigglesworth
Yehuda Goor
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036-6797
allan.brilliant@dechert.com
shmuel.vasser@dechert.com
david.kotler@dechert.com
catherine.wigglesworth@dechert.com
yehuda.goor@dechert.com
Tel: (212) 698-3500
Fax: (212) 698-3599

Attorneys for Oro Negro Primus PTE. Ltd.; Oro Negro Laurus PTE. Ltd.; Oro Negro Fortius PTE Ltd.; Oro Negro Decus PTE. Ltd.; Oro Negro Impetus PTE. Ltd.; Roger Bartlett; Roger Hancock; and Hunter Cochrane, Jr.